

Mr. Richard Karney
Department of Energy
ENERGY STAR Window Program
Fax: (202) 586-4617
E-mail: richard.karney@ee.doe.gov

Re: ENERGY STAR Window Proposed Revisions

Dear Mr. Karney;

As the Branch Manager of Arch Aluminum in Dallas, Texas and representing the position of 50 managers and employees at this branch, we strongly recommend that DOE:

Adopt the 4-zone proposal
Reject the 3-zone proposal

Arch, a multi-branch national company, is one of the largest fabricator and supplier of glass products to the US construction market. We are a major supplier of glass products (pyrolytic **and** sputtered Low-E products) to residential window manufacturers and have extensive experience in handling pyrolytic and sputtered Low-E products.

Based on our review of the DOE analysis, the 4-zone proposal is

?? good for the economy

?? good for the environment and

?? most importantly good for the direct consumers of windows.

In contrast, the 3-zone proposal has a negative impact in the marketplace by eliminating competition for energy efficient glass technology. In addition, the 3-zone proposal is based on a narrow rationale (peak energy demand) which should be questionable based on recent reports about energy supply and market manipulation of energy in California.

Based on the above and our position in the residential window industry, we recommend that the DOE make the right choice and adopt the 4-zone proposal.

Sincerely

Kevin Carter
Branch Manager

cc Senator John Cornyn (FAX- 202-228-2856)
Senator Kay Bailey Hutchison (FAX -202-224-0776)